## **Opportunities for Improvement**

This Office of Oversight review of the TSD radiation protection program identified several opportunities for improvement. These potential enhancements are not intended to be prescriptive. Rather, they are intended to be reviewed and evaluated by the responsible DOE and contractor line managers and prioritized and modified as appropriate, in accordance with site-specific programmatic and safety objectives.

- 1. Strengthen communications and coordination up and down the line management chain and among TSD management, support branches, and courier sections, to ensure that the interests of couriers are adequately considered in TSD priorities, policies, and decisions.
  - Increase senior management presence and visibility in the courier sections, including environment, safety, and health (ES&H) leadership.
  - Significantly improve management involvement in and support for the timely and effective resolution of ES&H concerns, including feedback to TSD employees on decisions and actions taken.
  - Strengthen processes associated with dissemination and flow of information to the couriers, including the quality and type of information being disseminated. Consider application of periodic employee surveys to provide feedback to management on how to improve TSD management systems and communications.
  - Increase courier involvement in decisions such as removal of the TBM-3S survey instruments.
  - Consider teaming couriers and safety staff to address widespread or significant safety concerns (e.g., lack of trust of TLDs, issues involving the bone yard).

- Ensure that convoy commanders document any radiological concerns in their trip reports and that health and safety personnel are notified about such concerns and provide timely feedback.
- Include field review as a part of the process for validating information prior to dissemination.
- Evaluate mechanisms for communications between TSD, AL, and the Headquarters Office of Defense Programs to assure an awareness of operations and issues.
- 2. Improve the quality and maintenance of program documents and procedures.
  - Review the radiation protection programs described in the Transportation Safety Analysis Report (TSAR) and radiation protection program and change to assure consistency when the TSAR is in use. Reevaluate the need for having two documents that cover the same areas.
  - Review the radiation protection elements prescribed in the radiation protection program and determine whether necessary processes for implementation are in place and understood by personnel. Develop additional procedures as necessary.
  - Review the process for maintaining the Courier SOP and incorporate changes to assure that controls include limits on the number of changes and that quality checks are performed to assure that changes are incorporated as specified.
  - Clarify the requirements for procedure compliance and usage for the Courier SOP.
  - Establish a team of technical experts and couriers to reevaluate the removal of survey instruments. Document the position and have the team communicate the results to courier sections.

- Include requirements such as use of shipment and vehicle certification forms in the Courier SOP.
- Describe the interface with site lockout/tagout programs for SSTs in the SOP to assure effective implementation. Consider requiring that the green tags that indicate that the SSTs have been surveyed remain on until the courier staff accept the vehicles for use.
- Develop a basis for periodic radiological surveys of aircraft that complies with 49 CFR requirements and considers the use of the aircraft for personnel transport.
- Evaluate benefits and potential issues associated with performing surveys for "full up" weapons leaving the Pantex Plant.
- 3. Enhance efforts to identify and correct implementation deficiencies.

- Increase management involvement in work activities.
- Increase emphasis on performance during assessments to provide opportunities to identify and correct implementation deficiencies.

## 4. Enhance training.

- Consider evaluating radiation training against the radiological conditions and controls encountered during the performance of courier/escort duties. Obtain input from couriers/escorts for this evaluation.
- Provide additional emphasis on differentiating between contamination and radiation and on the relationship between dose and potential health effects during training.